

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SHANNON PHILLIPS,

Plaintiff,

v.

STARBUCKS CORPORATION d/b/a
STARBUCKS COFFEE COMPANY,

Defendant.

CIVIL ACTION NO.: 1:19-cv-19432

Hon. Joel H. Slomsky, U.S.D.J.

PLAINTIFF'S MOTION TO COMPEL DISCOVERY FROM THE DEFENDANT

Pursuant to Federal Rule of Civil Procedure 37(a), Plaintiff, Shannon Phillips (“Plaintiff”), by and through her undersigned counsel, hereby moves this Court to compel Defendant, Starbucks Corporation d/b/a Starbucks Coffee Company (“Defendant”), to produce full and complete responses/documents to Plaintiff’s Requests for the Production of Documents in this matter (“Motion”). Specifically, Plaintiff seeks (1) any and all documents related to Paul Sykes’ separation of employment from Defendant, and (2) any and all documents related to Defendant’s internal investigation into pay disparities within its Philadelphia market beginning in April or May 2018, including any documents related to the Plaintiff’s participation in that investigation. In support of her Motion, the Plaintiff relies upon the accompanying Memorandum of Law.

Respectfully Submitted,

CONSOLE MATTIACI LAW, LLC

Dated: June 10, 2021

By: /s/ Katherine C. Oeltjen
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